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ACTION Stiger
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| BENEDETTI, R.L. | | |
| BENJAMIN, A. | | |
| BERMAN, H.S. | | |
| BARNIVAL, G.J. | | |
| BOPP, R.D. | | |
| BORDOVA, R.C. | | |
| DAVIS, J.G. | | |
| FERRERA, D.W. | | |
| FRANZ, W.A. | | |
| GANNI, B.J. | | |
| HEALY, T.J. | | |
| HEDAH, L.G. | | |
| HILBIG, J.G. | | |
| HUTCHINS, N.M. | | |
| KIRBY, W.A. | | |
| KUESTER, A.W. | | |
| MAHAFFEY, J.W. | | |
| MANN, H.P. | | |
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| PIZZUTO, V.M. | | |
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| SATTERWHITE, D.G. | | |
| SCHUBERT, A.L. | | |
| SETLOCK, G.H. | | |
| SULLIVAN, M.T. | | |
| SWANSON, E.R. | | |
| WILKINSON, R.B. | | |
| WILSON, J.M. | | |

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| CORRES CONTROL | X | X |
| PATS/T130G | X | X |
| ADMN RECORD/080 | X | 2 |

Reviewed for Addressee
Corres Control RFP

1-12-94 *CS*
DATE BY

Ret Ltr. #

DOE ORDER # 5400.1
4700.1

RF-46522 (Rev. 9/93)



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Accelerated Solar Ponds Closure

Sue Stiger, Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

The memorandum on Accelerated Solar Ponds Closure (M.S. Silverman to H.P. Mann, December 2, 1993) requested a plan for accomplishing pond closure and Building 788 removal, including a schedule, by December 17, 1993; and complete BCPs to support the actions by December 31, 1993. EG&G responded by a letter dated December 17, 1993, although not received by the DOE Mailroom until January 3, 1994. The purpose of this memorandum is to comment on the responses in the December 17 letter as they pertain to the Building 788 removal project, direct the use of the WBS as provided in the December 2nd memorandum, define an acceptable schedule level of detail within the context of the December 2nd guidance, and emphasize the need for a technical, schedule, and cost baseline by January 21, 1994.

EG&G made several points in the December 17th letter. First, a phased approach is being implemented, with the first phase to characterize, determine project criteria, and choose the best approach to implement. While ER/RFO recognizes that certain decisions cannot be made with complete certainty at this time, we feel that a better approach for a one year project is to establish a scope, cost, and schedule baseline for the whole project as at the beginning and change this baseline as circumstances dictate. This baseline should be established using documented assumptions and the experience of the project manager. These assumptions will be validated or refuted based on trade studies and characterization tasks early in the design process. The details of the approaches to be used are described in the ERMSA Project Control Requirements, which are part of the ERMSA Management Procedures and Requirements. The practical impact of implementing such an approach is not to delay those activities already planned or in progress, but to accelerate certain activities already identified to be done later in Phase 1.

Second, the December 17th letter expresses concern that RFO has made the decision to utilize a RCRA closure process to cover the removal of Building 788, but has not removed this scope from the Operable Unit (OU) No. 4 dispute resolution process. The RFO does not necessarily agree with the EG&G assessment of this issue and is evaluating it at this time.

Third, EG&G has attached its "scope and schedule" for Phase 1. While this level of detail was adequate for the BCP action to initiate project activities in the beginning of

Department of Energy

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December, it is not viewed as responsive to the December 2nd request for "... a complete plan with a technical, cost, and schedule baseline suitable for performance measurement use." This deliverable is still outstanding. Additionally, the schedule baseline needs to be for the whole project, and needs to be developed promptly and not provided as a deliverable at the end of Phase 1.

Fourth, the ER/RFO agrees with the EG&G recommendations that the portion of OU-9 falling within the confines of IHSS 101 should be part of the OU-4 scope and not the Building 788 removal project, and that removal of the Unit 21 and Unit 48 foundations should not be part of the Building 788 removal scope as long as this is compatible with the OU-4 closure approach. However, we do not agree that Section 4.0 of the SOW is overcome by events.

By copy of this memorandum I am directing implementation of Section 4.0 of the SOW attached to the December 2nd memorandum as the formal WBS for the Building 788 removal project. This WBS is established as the formal structure for planning and reporting analogous to the Project Summary Work Breakdown Structure (PSWBS) as described in the ERMSA Draft Project Control Requirements, with EG&G to develop the detail necessary below this level (i.e. the CSWBS). Project reporting to DOE will occur at this level of the PSWBS. The information from Section 4.0 is repeated for your convenience in Attachment 1, and given diagrammatically in Attachment 2.

The baseline schedule to be provided shall be a multi-level CPM-format schedule organized by the formal WBS elements given above, and should be provided by January 21, 1994. It is expected that the schedule will be fully developed in accordance with the schedule requirements stated in the ER MSA Draft Project Control Requirements. The schedule is expected, after review, to be approved as the baseline schedule for the project and be suitable for use in defining commitments to the regulators. The schedule must contain activities for every action by DOE and the regulators. The duration guidance for some of the DOE and regulator actions was provided in the December 2nd SOW; should other durations need to be discussed with this office, please do not hesitate to call.

The cost estimate for this project should be prepared in full compliance with the guidance provided in the ER MSA Project Management Plan (PMP), Draft, dated December 7, 1993.

Since this project is being funded out of the ERMSA, it is important that the guidance developed for the MSA be implemented. The receipt of the above baseline information will allow DOE to implement the Project Management System elements that have been issued. It is important to note that the implementation of the MSA/Project Management System will involve different definitions and procedures than those utilized for the plant MCS. Both systems will be utilized for the immediate future.

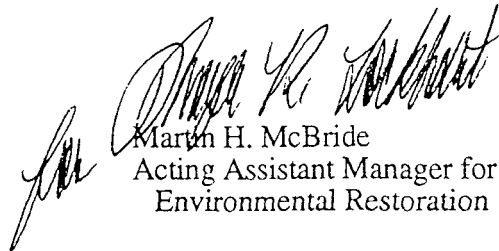
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The RFO recognizes that the accelerated schedule for removal of Building 788 and OU-4 closure will represent a significant challenge for EG&G. However, we hope that by working closely together and addressing the barriers to achieving these goals as a team, RFO and EG&G along with the regulators can succeed. The direction contained in this letter represents our best effort in providing explicit guidance of our expectations.

As questions arise on the PMP and Project Control Requirements guidance, please contact Mr. Vern F. Witherill or others of my staff promptly to discuss the requirements since this will be one of the first application of these requirements within the ER program.



Marvin H. McBride
Acting Assistant Manager for
Environmental Restoration

Attachment

cc w/ Attachment:
M. McBride, AMER, RFO
R. Schassburger, AMER, RFO
F. Lockhart, ER, RFO
V. Witherill, ER, RFO
P. Sanford, RFO, KMI
N. Hutchins, EG&G
T. DeMoss, EG&G
S. Keith, EG&G
A. Tome, EG&G

Attachment 1

4.0 Activities

Note: The activity descriptions assume a WBS format. The intent of this section is not to provide a definitive list of activities or preclude additions or modifications to this list, it is to give an indication of activities covered under these WBS items.

110 Project Management

- Interface with MSA
- Interface with OU-4
- Interface with matrix organizations
- Project Validation
- Project Responsibilities and Authorities

120 Baseline Documents

- Develop and maintain subproject baselines/ management documentation
- WBS
- OBS and RAM
- Cost estimates and CPM schedules to support the above
- ADS/ Budget documents
- Develop and maintain workpackages

130 Design Criteria

- Develop detailed D&D Design criteria
- Support OU-4 Requirements
- Confirm Criteria and Standards

140 Project Control

- Support cost collection and reporting
- Variance analysis
- Implementation of systems

150 Project Planning

- The following planning documents will be required:
 - Health and Safety Plan
 - Characterization Plan
 - QA Plan
 - Procurement Plan
 - Work Flow Diagrams??
 - Waste management (Waste generation estimate by waste types, unanticipated storage, and disposal sites)

160 Project Training

- Training Requirements Matrix
- General Plant training
- RCRA/HAZWOPER/etc.

- Minimal CONOPS, COE, etc.

170 Special Studies

- Issue papers will be prepared on the following:
 - Tradeoff between decon and recycle vs. disposal as waste (cover disposal as both in-pond fill and off-site to NTS and/or Envirocare; also, disposal of contaminated stream from a decon operation). Determine clean/contaminated waste splits based on disposition option.
 - Determination of waste disposal requirements based on clean, slightly contaminated, and LLW; evaluation of impact of WACs and Debris Rule.
 - Determine plant capacity for waste (various interim and final types), both permitted capacities and physical capacities. Identify ceiling issues and options.
 - Decontamination Options study
 - Waste storage limits for mixed waste: Determine the optimum method for obtaining added mixed waste storage space without significantly affecting current mixed waste storage limits.

200 Utilities and Common Support

- Support for utilities and normal maintenance for period from receipt of building from Waste Operations until demolition

310 NEPA Support

- Development of a CX or EA
- Preparation for, conduct of, and response to reviews by regulators and the public

320 RCRA/ CERCLA Support

- Criteria Definition document development to allow regulatory input
- RCRA Unit 21 and 48 Closure documents/input
- Preparation for, conduct of, and response to reviews by regulators and the public
- IM/IRA (If necessary)

330 Other Environmental Compliance

- Compliance with CAA, etc.
- Utilization of OU-4 umbrella
- Community relations/ information strategy development/ implementation
- Preparation for, conduct of, and response to reviews by regulators and the public
- Permits or Interim Status waste treatment / storage documentation

411 D&D Conceptual Design

- Develop detailed design basis
- Internal and external design reviews (including public comment)

- Preliminary cost estimate
- Waste estimates

412 D&D Assessment

- Assessment of rads and hazardous components to allow planning of work
- Assessment of rads and hazardous components to allow agreement on release approach
- Field sampling activities
- Laboratory support for characterization/ assessment activities
- Waste management

413 D&D Detailed Design

- Work Plans
- Readiness Assessment (or ORR) checklist
- Safety Assessment/ Category III SAR
- Standard Procedures (Generic and project specific)
- IWCP Packages (??)
- Waste management

420 Pre-D&D Equipment Removal

- Disconnection of utilities, etc. (Isolation)
- Removal of clean items
- Relocation of stored wastes
- Readiness Assessment (in-lieu-of an ORR)
- Waste management

430 External Process Equipment Removal

- Removal of silos, clarifier, pug mill, mixer, etc.
- Cleanup and release of equipment
- Shredding and crushing of equipment to support use as fill
- Waste management
- OU-9 activities(?)

440 Building Decontamination

- Cleanup of building
- Cleanup of decon cell
- Remove "release source"
- Waste management

450 Building Demolition

- Removal of structure
- Removal of foundation to grade
- Disposal of waste
- Waste management (Storage, Treatment , Disposal)

460 Final Cleanup

- QA to assure requirements are met
- Closeout of paperwork
- Final survey(?)

